

December 13, 2001

Mr. Randy Bates  
Division of Governmental Coordination  
Office of the Governor  
P.O. Box 110030  
Juneau, Alaska 99811-0030

Re: Comments on Draft Proposed Alaska Coastal Management Program Implementation Regulations

Dear Mr. Bates,

I am writing to comment on the October 1, 2001 (second) draft of the proposed Alaska Coastal Management Program (ACMP) Implementation Regulations. I appreciate that this regulation review and modification process has been in progress for more than two years and that various beneficial changes have been proposed in the current draft. However, I concur with the comments of the Alaska Miners Association and Resource Development Council for Alaska in that these regulations, as now proposed, continue to be un-workable and require significant additional changes if they are to go forward and survive legal challenge.

I hope that you will incorporate their recommended changes in preparing either a revised (third) draft for review or making fundamental changes to the proposed rulemaking. It would be a shame to have this process encumbered by legal challenges instead of representing a governmentally coordinated effort that supports effective management of Alaska's Coastal Zone.

Sincerely,



Robert J. Pawlowski